

# PUBLIC SUBMISSION

<b>As of:</b> October 03, 2011
<b>Received:</b> September 15, 2011
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 80f1dbf2
<b>Comments Due:</b> October 21, 2011
<b>Submission Type:</b> Web

**Docket:** EBSA-2011-0023

Summary of Benefits and Coverage and the Uniform Glossary

**Comment On:** EBSA-2011-0023-0001

Summary of Benefits and Coverage and Uniform Glossary

**Document:** EBSA-2011-0023-DRAFT-0006

Comment on FR Doc # 2011-21193

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## General Comment

If the requirement is for everyone to use a standardized format, then the format needs to be provided with the ability for the end user to fill in appropriate blanks, e.g. plan's web site, contact #'s, plan name, etc. For example, a fillable pdf form. While site are listed where this document is available, it is not presently available in a format that can be adapted for each plan.

The definitions could use quite a bit of of work. For example, common term for Preferred or Network Providers is PPO providers versus Non PPO providers for out of network.

Appeal definition is rather brief and should reference or provide a place to reference where to find the appeal rules.

Many definitions are missing, such as Preventive care--that mandated with references versus any other preventive care listed in the plan and the fact that preventive care is not subject to the deductible, copays or coinsurance.

UCR definition is incomplete and needs to clarify difference between network and non network UCR and member liability.